



Ellie Hale/R10/USEPA/US
08/13/2008 02:37 PM

To "Brown, PaulaJo J Civ USAF ACC 366 CES/CEVC"
<PaulaJo.Brown@mountainhome.af.mil>
cc "Roller, Richard C Civ USAF ACC 366 CES/CEV"
<Richard.Roller@mountainhome.af.mil>,
Steven_Morrisette@URSCorp.com

bcc

Subject Asbestos issue at Mountain Home AFB

Paula Jo -

Thanks very much for the information you provided below. I'm not sure I fully understand what you mean by AFB management of the situation, however.

EPA is concerned that there may be a CERCLA component of work here, because people in family housing could be exposed to asbestos--in their yards, or in air as a result of wind passing through areas where demolition/construction is in progress, or if people are playing in or passing through such areas. Also, workers could be exposed--if existing practices (such as sorting soil from debris) haven't been modified.

I'm wondering:

1. Has anyone inspected and sampled soils in areas where demolition and reconstruction was done in phases that came before the current work?
2. What has happened to the piles of soil (and fine asbestos fragments) and rock (and larger transite pipe fragments) that were present in fall 2007?
3. What effort has been made to plan for appropriate identification and management of transite before excavation work begins on a new phase?
4. As the asbestos could pose a risk to human health, has any effort been made to characterize that risk? (EPA recommends activity-based sampling)

Information on this aspect on the MHAFFB project has been difficult to get. EPA wants to be able to verify that protection of human health and the environment is being assured. Would you be open to further communication on this subject?

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"Brown, PaulaJo J Civ USAF
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07/31/2008 07:11 AM

To Ellie Hale/R10/USEPA/US@EPA

cc <Steven_Morrisette@URSCorp.com>, "Roller, Richard C
Civ USAF ACC 366 CES/CEV"
<Richard.Roller@mountainhome.af.mil>

Subject RE: Checking in on the status of the Base General Plan

Elly -

IDEQ sent us an Information Order - request for information pertaining to the asbestos issue you are questioning. We are currently waiting for

USEPA SF



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our Wing Commander to sign the letter for us to submit the requested information back to IDEQ. We also had an IDEQ asbestos inspection yesterday during which the inspector was pleased with our management of the inadvertent situation we are currently resolving in Military Family Housing. The inspector also checked Verlinde Hill, our on-base asbestos pit, and a housing abatement action that was in progress.

I hope this helps. PJ

-----Original Message-----

From: Roller, Richard C Civ USAF ACC 366 CES/CEV
Sent: Wednesday, July 30, 2008 3:28 PM
To: Hale.Ellie@epamail.epa.gov
Cc: Brown, PaulaJo J Civ USAF ACC 366 CES/CEVC;
Steven_Morrisette@URSCorp.com
Subject: RE: Checking in on the status of the Base General Plan

Elly,

Yes, URS prepared the minutes of the telecon. We will get those to you tomorrow morning.

Reference the housing, I know there was substantial work done to insure construction practices were followed to cause minimal disturbance as well as identification and pick-up of the pipe fragments. The ultimate disposal of the rubble is to the asbestos allowed landfill on base.

I will try to find out about the current status and actions taken.

Rick

-----Original Message-----

From: Hale.Ellie@epamail.epa.gov [mailto:Hale.Ellie@epamail.epa.gov]
Sent: Wednesday, July 30, 2008 3:21 PM
To: Roller, Richard C Civ USAF ACC 366 CES/CEV
Subject: RE: Checking in on the status of the Base General Plan

Welcome back, Rick, and thanks!

So, now for another question. Did someone prepare notes/minutes from that meeting? I'd like to see them soon.

And one other: Is there any further work happening on the housing development? Have the practices changed to avoid further disturbance of buried asbestos-containing pipe? And is there any report prepared or in preparation that documents the ultimate disposition of the pipe, rubble/pipe debris, and stockpiled soil, and identifies areas where excavation, storage and reuse of the material occurred?

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07/30/2008 02:01
PM

Ellie Hale/R10/USEPA/US@EPA

To

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Subject

RE: Checking in on the status of
the Base General Plan

Elly,

Great to hear from you. Sorry I missed the call last week. Was going through security at Las Vegas airport on the way to Lubbock, TX.

I did find notes from Bruce Oshita on his recommended changes to the Base General Plan which generally follow most of your discussion.

I will get with the Community Planner tomorrow and find out when they intend to update the current version. What I sent to you several months ago may not have included Bruce's changes.

I am happy to make sure these restrictions and LUC descriptions are noted in the document.

Rick

-----Original Message-----

From: Hale.Ellie@epamail.epa.gov [mailto:Hale.Ellie@epamail.epa.gov]

Sent: Wednesday, July 30, 2008 11:31 AM

To: Roller, Richard C Civ USAF ACC 366 CES/CEV

Cc: Cora.Lori@epamail.epa.gov; Dean.Nygard@deq.idaho.gov

Subject: Checking in on the status of the Base General Plan

Rick -

I was just looking through emails and found one you sent me in late May of this year (5/27/08, to be exact). You were responding to my query of 4/02/08 on how the AF had addressed the institutional control requirements of the ESDs. You attached an excerpt from the current Draft Base General Plan and said you'd be reviewing it in more detail to possibly include specific descriptions of the land use controls in the document. I replied with copies of the ESDs.

What is the status of the Base General Plan at this point?

Having looked at the excerpt you sent, I see it makes no reference to the ESDs, which probably should be changed. And there are some inconsistencies between the text and Table 4A-3. The Table only has two

options (other than "transfer to compliance"): LUCs or UU/UE. I think that the list may have changed some, and also think there should be a distinction between the sites with ESDs for permanent institutional controls versus those that have cleanup actions pending that may get them to UU/UE. I think it could be done clearly without making the plan unnecessarily detailed.

I also want to draw your attention to the ESD for ST-11 (signed March 2004) and ESDs for LF-01 and LF-02 (both signed by EPA in September 2006). Item 4 in the later ESDs states:

Ensure that the BCP is updated to include the following: a map and details of the LUCs; a discussion of the purpose of the LUCs, regulatory requirements for the LUCs; and base entities responsible for implementing, monitoring, and enforcing the LUCs. Notify EPA and IDEQ of any changes to the LUC information or LUC procedures included in the BCP or process changes which alter LUC coverage in the BCP.

Also, item 3 requires that the AF submit for recordation at the local recording office, which for withdrawn land is the base Civil Engineering Squadron (CES) Real Estate Office. I'm not aware of whether this has been done, so would like to request that you address this in your reply.

Thanks, Rick.

Elly

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